

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA ex. rel.
YOASH GOHIL,

Plaintiff/Relator,

vs.

SANOFI U.S. SERVICES INC., et al.

Defendants.

No. 02-cv-2964

**JOINT NOTICE OF STIPULATION AND CONSENT TO
VOLUNTARY DISMISSAL OF RELATOR’S CIVIL ACTION**

On or about May 17, 2002, Relator Yoash Gohil (“Relator”) filed a *qui tam* complaint on behalf of the United States styled *United States ex rel. Yoash Gohil v. Aventis Pharmaceuticals, Inc. et al.*, 02-cv-2964 (E.D.Pa.), alleging violations of the False Claims Act, 31 U.S.C. §§ 3729-3733. The complaint was amended on or about July 23, 2002 (“First Amended Complaint”), on or about February 9, 2007, and on or about May 13, 2015 (the original complaint and all amendments thereto are collectively referred to herein as the “Civil Action”). The United States declined to intervene in Relator’s First Amended Complaint and, to date, has not intervened in the Civil Action.

Relator now seeks the voluntary dismissal of any and all claims stemming from allegations in the Civil Action, including but not limited to Relator’s claim for reasonable Attorneys’ Fees and Costs. Relator and Defendants Sanofi U.S. Services, Inc., Aventis, Inc. and Aventisub, LLC (collectively, “Aventis” or the “Company”) hereby stipulate that the Civil Action and all claims brought therein should be dismissed with prejudice as to Relator pursuant to Federal Rule of Civil Procedure 41(a)(1) and without prejudice to the United States. Except as otherwise agreed in the

written agreement resolving Relator's claim for reasonable attorneys' fees and costs under 31 U.S.C. §3730(d), each party shall bear its own costs.

A proposed order accompanies this Joint Notice of Stipulation and Consent.

Respectfully submitted,

/s/ Richard L. Scheff
Richard L. Scheff, Esquire
Armstrong Teasdale

*Counsel for Defendants
Sanofi U.S. Services, Inc.,
Aventis, Inc., and AventiSub LLC*

/s/ Stephen M. Orlofsky
Stephen M. Orlofsky, Esquire
Blank Rome, LLP

*Counsel for Plaintiff/Relator
Yoash Gohil*

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ORDER OF DISMISAL

Pursuant to Federal Rule of Procedure 41(a), Relator Yoash Gohil (“Relator”) and Defendants Sanofi U.S. Services, Inc., Aventis, Inc. and Aventisub, LLC (collectively, “Aventis”) filed a Joint Notice of Stipulation and Consent to Voluntary Dismissal of Relator’s Civil Action. Upon due consideration of the Stipulation and the other papers on file in this action,

IT IS HEREBY ORDERED that any and all claims asserted by Relator against Aventis shall be dismissed with prejudice as to Relator and shall be dismissed without prejudice as to the United States.

Date: _____

ANITA B. BRODY, J.